



COWAN,
DeBAETS,
ABRAHAMS &
SHEPPARD LLP

41 MADISON AVENUE
NEW YORK, NY 10010
T: 212 974 7474
F: 212 974 8474
www.cdas.com

NANCY E. WOLFF
212 974 7474
NWOLFF@CDAS.COM

October 28, 2022

VIA ECF

The Honorable Sarah Netburn
United States District Court
Southern District of New York
Thurgood Marshall Courthouse
New York, NY 10007

Re: *Lynne Freeman v. Tracy Deebs-Elkenaney et. al.*, 1:22 Civ 02435 (AT)(SN)

Dear Judge Netburn:

Plaintiff Lynne Freeman and Defendants Tracy Deebs-Elkenaney p/k/a Tracy Wolff, Entangled Publishing, LLC, Holtzbrinck Publishers, LLC d/b/a Macmillan, Universal City Studios LLC, Prospect Agency, LLC, and Emily Kim Sylvan jointly write pursuant to Your Honor's October 13, 2022 Order (the "Memo Order," ECF No. 73) to update the Court on the status of discovery.

The parties substantially completed their document productions by October 21, 2022, as required by the Memo Order. Plaintiff produced approximately 1,940 documents and Defendants produced approximately 41,400 documents. The parties are in the process of reviewing each other's document productions. Plaintiff does not anticipate being able to commence taking depositions until December. Defendants anticipate noticing depositions within the coming week.

The parties currently disagree as to whether they have respectively satisfied other requirements of the Memo Order. The parties have advised each other of several potential disputes and intend to meet and confer in the near future. The parties will further update the Court if any issues require the Court's involvement.

Respectfully submitted,

CSReeder, PC

By: 

Mark D. Passin
11766 Wilshire Boulevard, Suite 1470
Los Angeles, CA 90025
310-861-2475

**COWAN, DEBAETS, ABRAHAMS,
& SHEPPARD LLP**

By: 

Nancy E. Wolff
41 Madison Avenue, 38th Floor
New York, New York 10010



COWAN,
DeBAETS,
ABRAHAMS &
SHEPPARD LLP

PAGE 2

mark@csrlawyers.com

REITLER KAILAS & ROSENBLATT LLP

Paul V. LiCalsi
885 Third Avenue, Ste 20th Floor
New York, NY 10022
212-209-3090

plicalsi@reitlerlaw.com

Attorneys for Plaintiff Lynne Freeman

212-974-7474

nwolff@cdas.com

Attorneys for Defendants Tracy Deeb-
Elkenaney p/k/a Tracy Wolff, Universal City
Studios, LLC, Entangled Publishing, LLC
and Holtzbrinck Publishers, LLC, d/b/a
Macmillan sued erroneously as Macmillan
Publishers, LLC

KLARIS LAW PLLC

By: *Lacy H Koonce*
Lacy H. ("Lance") Koonce, III
29 Little West 12th Street
New York, New York 10014
917-612-5861

lancekoonce@gmail.com

Attorneys for Defendants Emily Sylvan Kim and
Prospect Agency, LLC

cc: All Counsel of Record (via ECF)